

**EXHIBIT 11**

**Transcript of Deposition of Passenger Turkessa Vanrensalier-Wideman**

**In the Matter Of:**

PETER DELVECCHIA, et al.

V.

FRONTIER AIRLINES, INC., et al.

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**TURKESSA VANRENSALIER-WIDEMAN**

*November 07, 2022*

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LEGAL | MEDIA | EXPERTS

PETER DELVECCHIA, et al. V. FRONTIER AIRLINES, INC., et al.  
VANRENSALIER-WIDEMAN, TURKESSA on 11/07/2022

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEVADA  
3 Case No.: 2:19-CV-01322-KJD-DJA

4  
5 PETER DELVECCHIA, et al., )  
6 Plaintiffs, )  
7 vs. )  
8 FRONTIER AIRLINES, INC., )  
9 et al., )  
10 Defendants. )  
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12 DEPOSITION  
13 OF  
14 Turkessa Vanrensalier-Wideman  
15  
16  
17  
18  
19  
20  
21

22 Via Video Conference Reported by:  
23 Monday, November 7, 2022 - 6:00 p.m. Dale Ring  
24  
25

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1 A P P E A R A N C E S

2

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13 (There were no exhibits introduced.)

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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: We are going on  
3 the record at approximately 6:02 p.m.  
4 This is the video deposition of Turkessa  
5 Vanrensalier-Wideman taken by the  
6 Plaintiff in the matter of Peter  
7 DelVecchia, et al., versus Frontier  
8 Airlines Incorporated, et al., filed in  
9 the United States District Court for the  
10 District of Nevada, case number  
11 219-CV-01322-KJD-DJA.

12 This is a remote deposition with  
13 participants from multiple locations  
14 being held on November 7, 2022. Please  
15 note that audio and video recording will  
16 take place unless all parties agree to go  
17 off the record.

18 Counsel and all present will now  
19 state their appearance, affiliation and  
20 location for the record after which the  
21 court reporter will swear in the witness.

22 MR. MCKAY: Hi. This is John McKay.  
23 I'm counsel for the Plaintiff, Peter  
24 DelVecchia and A.D., his son. I am  
25 located in San Francisco. That's my

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1 office location. I'm actually right now  
2 in Fairfax, Virginia.

3 MR. MAYE: Brian Maye for Frontier  
4 Airlines and the two witnesses(audio  
5 failed).

6 MR. MCKAY: Mr. Maye --

7 MR. MAYE: Yes.

8 MR. MCKAY: -- you're cutting out.  
9 You're cutting out. I'm sorry, I missed  
10 three or four of those words.

11 MR. MAYE: Okay. Let me -- I'll  
12 start over.

13 MR. MCKAY: Okay.

14 MR. MAYE: It's now, Brian Maye for  
15 Frontier Airlines and Captain Shoope and  
16 Flight Attendant Scott Warren.

17 MR. MCKAY: Thank you.

18 THE COURT REPORTER: Okay. Ma'am,  
19 I'm going to swear you in. Would you  
20 please raise --

21 THE WITNESS: Uh-huh.

22 THE COURT REPORTER: -- would you  
23 please raise your right hand.

24 THE WITNESS: Yes.

25 Turkessa Vanrensalier-Wideman

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1                   having first been duly sworn, was  
2                   examined and testified as follows:

3                   THE COURT REPORTER: Thank you,  
4           ma'am.

5           DIRECT EXAMINATION

6           BY MR. MCKAY:

7           Q           Ms. Wideman, hi, I'm John McKay. I  
8                   represent the Plaintiffs and we've spoken  
9                   on the phone before. I'm glad you're  
10                  feeling better and thank you very much  
11                  for attending to this deposition. I'm  
12                  going to ask you, first of all, if you  
13                  would state your first and last names and  
14                  spell them, please.

15          A           My name is Turkessa Vanrensalier-Wideman,  
16                   T-u-r-k-e-s-s-a V-a-n-r-e-n-s-a-l-i-e-r,  
17                   hyphen, W-i-d-e-m-a-n.

18          Q           Thank you very much. And do you prefer  
19                   to be called Ms. Vanrensalier-Wideman,  
20                   then?

21          A           Ms. Wideman is fine.

22          Q           All right. Would you state your address,  
23                   please?

24          A           1702 Marion Street, Greensboro, North  
25                   Carolina, 27403.



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1 Q Now, have you ever had your deposition  
2 taken before?

3 A No.

4 Q Okay. So let me tell you a few things  
5 about the process. This is a court  
6 proceeding or a proceeding that's  
7 authorized by the rules of court and it's  
8 a way for us to take your testimony from  
9 the comfort of your home but it is a --  
10 it is treated as a court proceeding --

11 A Uh-huh.

12 Q -- especially because we may be playing a  
13 videotape of this at the trial for the  
14 jury to see. So even though you're not  
15 in a courtroom and neither are we, and  
16 even though there's no judge present,  
17 your testimony today should be no  
18 different than if we were in a courtroom  
19 and there was a judge present. Is that  
20 okay with you?

21 A Yes.

22 Q Okay. Now, there's a few things that we  
23 have to do to keep the record straight.  
24 And as you probably notice on the screen  
25 here, we have a court reporter who is

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1 taking down a transcript of everything  
2 that you and I say. And in order for him  
3 to get everything accurate, which helps  
4 both you and us, we have to make sure  
5 that you and I do not speak at the same  
6 time because it's sort of like people  
7 talking on a walkie-talkie. If they both  
8 talk at the same thing, nothing gets  
9 taken down. So in this case nothing gets  
10 written down.

11 So we have to be sure to be a little  
12 bit artificial in the way we talk in the  
13 sense that I need for you to wait until  
14 I'm completely finished speaking before  
15 you begin your answer, and I will do the  
16 same to make sure that you have stopped  
17 speaking before I begin another question.  
18 Understood?

19 A Yes.

20 Q We also have to be sure that, when you  
21 answer, you answer with words rather than  
22 non-verbal responses such as uh-huh  
23 because those non-verbal responses are  
24 very confusing when there's a written  
25 record of the testimony. So if -- if you

1     forget that at any time, I'll -- I'll be  
2     sure to remind you, but just so you're  
3     aware of that.

4             Now, if you answer a question, we  
5     will assume that you understood the  
6     question. So it's very important if you  
7     don't understand what I'm asking to say  
8     so before you answer the question. Just  
9     simply say I don't understand that or  
10    could you repeat it and I will be happy  
11    to do so. And I can rephrase the  
12    question, if it's phrased in a way  
13    that -- that maybe you're not  
14    understanding what I'm trying to ask.

15            If you are asked to, for instance,  
16    estimate a distance from you, please be  
17    sure that -- that you estimate rather  
18    than guess. And there's a big difference  
19    between the two. So if you are sitting  
20    anywhere near a table right now, I could  
21    ask you to estimate the size of the  
22    tabletop and that's something you could  
23    do because you can see the table. If I  
24    were to ask you to estimate the size of  
25    the tabletop that's currently in front of

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1 me, that would be a guess because you've  
2 never seen the tabletop in front of me.  
3 Is that understandable?

4 A Yes.

5 Q Okay. So we don't want you to speculate.  
6 We don't want you to guess. We only want  
7 you to estimate in situations where you  
8 were able to observe what you're  
9 estimating.

10 Is there any reason why your  
11 deposition should not be taken today?

12 A No.

13 Q Okay. Great. Well, I'll -- I'll begin  
14 with a few background questions and then  
15 we'll get right to the heart of the  
16 matter, which is a -- an airplane --  
17 airline flight back in 2019. But first  
18 of all, could you tell me what your  
19 highest level of education was?

20 A Some college.

21 Q Okay. And was that in -- in North  
22 Carolina or South Carolina?

23 A No, it was(audio failed).

24 Q I'm sorry.

25 A Baltimore.

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1 Q Oh, okay. And what did you study in  
2 college?  
3 A Medical assisting and I'm also going for  
4 my RN degree.  
5 Q Oh, so you're still taking some college  
6 now?  
7 A Yes.  
8 Q Okay. Understood. Now, I know you're  
9 about to start a new job from our  
10 discussion the other day.  
11 A Uh-huh.  
12 Q What was the job that you were working at  
13 up until now?  
14 A Medical assisting.  
15 Q And where was that?  
16 A Interactive Resource Center.  
17 Q Okay. Is that in your town there in  
18 Greensboro?  
19 A Yes, that's correct.  
20 Q And what is the job that you're going to  
21 be starting out?  
22 A The same. I'm going to be doing medical  
23 assisting, just for a different company.  
24 Q Okay. And what company is that?  
25 A Wake Forest Baptist.

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1 Q All right. What is your marital status,  
2 if -- if you don't mind?  
3 A I'm (audio failed).  
4 Q I'm sorry. I missed that.  
5 A I'm (audio failed).  
6 Q I didn't hear that again. It's cutting  
7 out.  
8 A Married.  
9 Q You're married, okay. Thank you. And  
10 what's your husband's name?  
11 A Umbreteo Wideman.  
12 Q Can you spell that first name, please?  
13 A U-m-b-r-e-t-e-o.  
14 Q Thanks. And how long have you and --  
15 A Uh-huh.  
16 Q -- Umbreteo been married?  
17 A Since 2003.  
18 Q And do you have any children?  
19 A Yes, I do.  
20 Q Okay. How many children do you have?  
21 A I have four.  
22 Q Okay. And I want to ask you now about  
23 the flight, which was Frontier flight  
24 number 2067 that occurred on March 28 of  
25 2019 and that went from Raleigh Durham

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1 International Airport in North Carolina  
2 to Las Vegas. Do you remember that  
3 flight?  
4 A Yes.  
5 Q And if I refer to it in the deposition  
6 and in my questions as the flight, can we  
7 agree that that's what we're talking  
8 about?  
9 A Yes.  
10 Q Okay. Why were you taking that flight?  
11 A I was going to visit my son (audio  
12 faltered) birthday.  
13 Q Your son for whose birthday?  
14 A My birthday.  
15 Q Okay. All right. And what -- what is  
16 your birthday?  
17 A March 29.  
18 Q Okay. And your son lives where?  
19 A Las Vegas.  
20 Q Okay. And what does he do out there?  
21 A He's a mechanic.  
22 Q All right. Auto mechanic?  
23 A Yes.  
24 Q Okay. Now, do you remember boarding the  
25 flight?

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1     A           Yes, I do.

2     Q           And do you remember seeing my clients.

3                Mr. DelVecchia and his son, board the  
4                flight?

5     A           Yes.

6     Q           Okay. What, if anything, did you observe  
7                about them?

8     A           He was just boarding the plane with his  
9                son. Initially, when we got on they were  
10               ahead of me on the plane. They were  
11               actually in the emergency aisleway. And  
12               I do know from when you're booking like  
13               there is a disclaimer they give you about  
14               booking that row on the flight. And I  
15               would -- I -- I want to say that I  
16               remember the airline stewardess  
17               relocating them to a different seat  
18               because of him travel -- your client  
19               traveling with a child on the plane.

20    Q           Okay. And -- and how did you know  
21                that -- that -- that was the reason for  
22                the reseating?

23    A           Because when you book a flight, they give  
24                you a disclaimer that it's an emergency  
25                aisle exit. If you're going to be in



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1                   that seat, that you're expected to help  
2                   people off of the plane.  
3       Q           Uh-huh.  
4       A           And I don't believe a child can help  
5                   anybody off of a plane.  
6       Q           Okay. Is that something that you knew at  
7                   that time or that you found out later?  
8       A           Yes.  
9       Q           Well, so --  
10      A           It's something (audio faltered).  
11      Q           I'm sorry, say again.  
12      A           That's something that I knew at that  
13                  time.  
14      Q           Okay. So when -- when you saw them  
15                  reseated, you -- you knew that it was  
16                  something that had to do with the young  
17                  child's age?  
18      A           Yes, that's correct.  
19      Q           Okay. All right. Did you -- how did you  
20                  see them in terms of -- what was their  
21                  reaction to being reseated?  
22      A           Your client complied with the airline  
23                  stewardess and he -- he moved with his  
24                  child to another seat.  
25      Q           Okay. Did it look like either of them

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1 was upset about having to move?

2 A No, he did not look upset. I think he --  
3 he was more confused about it. And I do  
4 not -- I do not -- well, let me say this  
5 again. So the airline steward did not  
6 explain that to them but in my mind that  
7 is what I thought about when I was  
8 booking my airline ticket about the  
9 disclaimer of that row and it being an  
10 emergency exit that a child would not be  
11 able to help anybody off of a plane in  
12 case of an emergency landing. So, you  
13 know, that's what I took from it, but  
14 nobody explained that to him on the  
15 plane.

16 Q Now, when -- when you say that he was  
17 confused -- he looked confused, which he  
18 do you mean?

19 A Your client, Mr. DelVecchio [sic].

20 Q Okay. Just to -- to be clear, they're  
21 both my clients, so you mean the adult  
22 Mr. DelVecchia?

23 A (Inaudible.)

24 Q Okay. And -- and how about the son? How  
25 did he look to you?

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1     A           He had on earphones and he had a tablet  
2                with him, So I think he was distracted.  
3                I -- it didn't look like he was upset  
4                about moving there at all.

5     Q           Okay.

6     A           Uh-huh.

7     Q           So as -- as far as what you observed  
8                there, it was all very -- would you say  
9                it was peaceful?

10    A           Yes.

11    Q           Okay. Now, as far as their appearances,  
12                what -- what did you notice about them?  
13                Let's start with Mr. DelVecchia --  
14                let's -- let the -- the adult. What --  
15                what did you notice about the adult,  
16                Mr. Delvecchia?

17    A           It was a older Caucasian gentleman with  
18                a -- a black young child. That's what I  
19                noted. Uh-huh.

20    Q           Okay. And -- and so as you observed the  
21                child, you could tell that it was a -- a  
22                child?

23    A           Yes.

24    Q           Okay. All right. What happened -- well,  
25                let me ask you this. Where did they get

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1 reseated to?

2 A They got seated across the aisle from  
3 the -- the row that I was sitting in.  
4 They got seated on the other side. So I  
5 guess I was -- I'm not going to say I  
6 guess. I was in the window seat on the  
7 opposite side of where they relocated  
8 Mr. DelVecchio [sic] and his son.

9 Q Okay. So you and they were in the same  
10 numbered row, but you were on one side of  
11 the plane and they were on the other?

12 A Yes, that's correct.

13 Q So just so there's no confusion is it  
14 okay with you if I call the side that you  
15 were on the ABC seats and the side that  
16 they were on the DEF seats?

17 A That's correct.

18 Q Okay. So did you notice them -- after  
19 they got reseated, did -- did you look  
20 across and -- and see them in the DEF  
21 seats?

22 A Yes, that's correct.

23 Q And which of those seats were they in?  
24 Who was at the window seat?

25 A It's been a long time. I do believe the

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1 child was by the window seat and the

2 fa -- the father was in the middle seat

3 next to him.

4 Q Okay. And was there anybody in the aisle  
5 seat that you remember?

6 A Yes.

7 Q Okay. And what did you observe about the  
8 person in the aisle seat?

9 A We were all asleep because it was a  
10 overnight flight. Though it was like I  
11 remember going to sleep because I was  
12 tired. So it was kind of a quiet flight,  
13 not a lot going --

14 Q Okay. Now, before we get to you  
15 sleeping, I wanted to ask if you made any  
16 observations about a person in the aisle  
17 seat of the DEF seats?

18 A Other than a Caucasian man, no, I just  
19 think they were all -- we were all just  
20 kind of just asleep. I don't remember.  
21 It's been a long time, but I do remember  
22 Mr. DelVecchio and his son sitting in  
23 that -- in those seats, the middle and  
24 the window seat.

25 Q Okay. And just so I understand what

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1                   you're saying --

2     A           (Inaudible.) Go ahead, I'm sorry.

3     Q           No, okay. So just so I understand what

4                you were saying, they -- there was a

5                different Caucasian man in the aisle

6                seat; is that right?

7     A           Yes, that's correct.

8     Q           Okay. So -- so after take off then you

9                said -- did you go to sleep?

10    A           Yes.

11    Q           Okay. And did anything happen that

12                caused you to wake up?

13    A           Yes. Halfway into the flight, we were

14                all kind of woken up. The entire plane

15                was woken up. The airline stewardess

16                came down the aisle and told

17                Mr. DelVecchio, the father of the child

18                that he was with, that they needed to see

19                his son and he questioned why they were

20                taking his son. I do remember a African-

21                American man saying, "We'll talk to you

22                more about it when the land -- plane

23                lands." At that time, Mr. DelVecchio was

24                upset and obviously we're up thousands of

25                feet in the air and it just kind of like

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1 rattled everybody on the plane. We were  
2 kind of all upset because we didn't  
3 understand what was going on and, you  
4 know, he was trying to figure out why the  
5 staff took his son. And he wasn't --  
6 Q (Inaudible) --  
7 A -- given an explanation, so.  
8 Q Okay. Let's break that down a little bit  
9 into -- into steps. What was the -- the  
10 first thing that woke you up?  
11 A The airline stewardess going to  
12 Mr. DelVecchio and asking for the child  
13 to come with them quietly.  
14 Q Okay.  
15 A (Inaudible.)  
16 Q You mentioned an African-American male.  
17 A Uh-huh.  
18 Q But you've -- you've ment -- you've said  
19 stewardess, so is it -- was it a female  
20 or a male that approached him?  
21 A The female initially that came with --  
22 came to Mr. DelVecchio and asked for the  
23 child to come with her. And then when  
24 Mr. DelVecchio got up out of his seat to  
25 see where they were taking his son, a

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1 male -- a African-American male -- I  
2 don't know if he was staff or undercover.  
3 I don't know what he was. But he said,  
4 "Well, when the plane -- the plane lands,  
5 we'll talk to you more about what's going  
6 on." This was maybe a hour away from  
7 Las Vegas. So maybe about an hour away  
8 from us landing is when they told him  
9 that they would tell him more once we  
10 landed.

11 Q Did you at any time see the African-  
12 American male leaning over the aisle seat  
13 occupant?

14 A I -- I don't remember that, no.

15 Q Okay. Do you remember speaking with me  
16 on the telephone a month or so ago?

17 A Yes, but -- yeah, I do.

18 Q Okay. And as far as the -- the man  
19 leaning -- the -- the African-American  
20 man leaning into the aisle, today you  
21 don't remember anything about that?

22 MR. MAYBE: Object to form.

23 A Other than him telling him that they  
24 would let him know what was going on with  
25 his son when the plane landed, no.



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1 Q Okay. Do you remember at any time seeing  
2 the African-American male who you've  
3 described as coming to the row to speak  
4 with Mr. DelVecchia, do you remember ever  
5 seeing him touch Mr. DelVecchia?

6 A No, I don't.

7 Q You don't remember him with his hand on  
8 Mr. DelVecchia's chest?

9 A

10 Q Okay. You never --

11 A I didn't --

12 MR. MAYE: (Inaudible.)

13 A Yeah, I didn't see him put his hand on  
14 him at all, no.

15 Q Never at any time during the flight?

16 A No, if he did, it was after we un-boarded  
17 the plane when the plane landed.

18 Q Okay. Okay. Now, you mentioned a  
19 discussion. Was that the discussion with  
20 the other people who were in the ABC  
21 seats?

22 A Yes.

23 Q And --

24 A So the girl that was next to me in the  
25 seat, we visit -- we did see

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1 Mr. DelVecchio get very upset when they  
2 did not give him a explanation as to why  
3 they took his son. I remember  
4 Mr. DelVecchio reaching for his bookbag  
5 trying to get infor -- a phone and get  
6 paperwork outof the bookbag to figure  
7 out -- and I don't know who he was trying  
8 to call in the middle of the flight, but  
9 it looked like he was trying to get his  
10 phone to talk to someone about what was  
11 going on with his son.

12 Q Well, you didn't -- did you see him  
13 actually speaking into the phone?

14 A I saw him pull the phone out. I didn't  
15 actually see him talk to anyone on the  
16 phone, but I did see him pull the phone  
17 out. When the plane did land, I believe  
18 that he did actually try to call someone.  
19 I don't know who. I did not hear the  
20 conversation but I do know he was trying  
21 to reach someone on his phone once the  
22 phone landed -- I mean, the plane.

23 Q Okay. The plane landed, understand.

24 So --

25 A Yes.

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1 Q -- let's go back to when the plane is  
2 still in the air and he reaches in the  
3 bag for a phone. Was this a smartphone,  
4 like an iPhone?

5 A I -- I can't be sure. I didn't see  
6 exactly what kind of phone it was but I  
7 did see that he had a phone --

8 Q Did it look --

9 A -- or he had a device.

10 Q Did it look like the kind of thing that  
11 you might have stored pictures on?

12 A I don't know. I -- I -- I couldn't get a  
13 clear picture of what he had in his hand.

14 Q Well, I'm just going to the -- you had  
15 the thought that he was trying to call  
16 somebody from, you know, 30,000 feet.

17 A Uh-huh.

18 Q Could it have been equally possible that  
19 he was wanting to bring up some  
20 photographs of his family to show that --  
21 that this was his son?

22 MR. MAYE: Object to form.

23 Q I -- I can't be sure. I don't know what  
24 he was trying to get out of his phone. I  
25 just know that he pulled out a device and

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1 it looked like a phone. He possibly was  
2 trying to make a call. He could have  
3 looked for pictures. I really don't  
4 know.

5 Q Okay. When you saw his son being taken  
6 away, what did you think in your mind was  
7 going on?

8 A In my mind, I thought that maybe it was  
9 possible they thought that he could be  
10 human trafficking the child just because  
11 it was a Caucasian man with a black  
12 child, a older Caucasian male with a  
13 black child. Honestly, that's what I  
14 thought. I was hoping that -- that's not  
15 what it was.

16 But I mean, the fact that they did  
17 not give him any explanation as to why  
18 that they took his child from him, I -- I  
19 can't understand why you would take a  
20 child in the middle of the flight. I've  
21 taken a lot of flights in -- in my time,  
22 and I travel sometimes for work, and I've  
23 never seen that happen.

24 And it was a little alarming because  
25 it's a lot going on high up in the sky

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1 and no one wants -- I mean, it just gave  
2 me a flashback of a 9/11 situation where  
3 it's just like something going on in the  
4 air. And we're all stuck in this plane  
5 together. It was a little traumatic,  
6 honestly.

7 Q Okay. So --

8 A So we --

9 Q Human trafficking is -- is a pretty  
10 serious thing in your mind, right?

11 A Yes, (audio faltered), yep, uh-huh.

12 Q So -- so you thought that it was a -- a  
13 situation that was playing out in front  
14 of you that -- that a human trafficker  
15 had been caught?

16 MR. MAYE: Object to form.

17 A Yeah.

18 Q Okay. So -- so you thought you were  
19 seeing the -- the airline taking action  
20 against a human trafficker?

21 A Yes.

22 Q Okay. And how did you feel about being  
23 right across the aisle from such a  
24 person?

25 MR. MAYE: Object to form.

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1     A             I was -- I was upset because I didn't  
2                   know what was going on. None of us knew  
3                   what was going on. We just -- it was  
4                   just a lot -- a lot of commotion in the  
5                   air.

6     Q             Were you concerned about having somebody  
7                   across the aisle who -- who might be  
8                   engaged in human trafficking?

9                   MR. MAYE: Object to form.

10    A             I was upset that some -- that a child was  
11                   taken from an adult that had boarded the  
12                   plane with him and no explanation was  
13                   given to him as to why they took his  
14                   child.

15    Q             Did you ever see Mr. DelVecchia try to go  
16                   to the back of the plane?

17    A             Yes.

18    Q             And what -- what did you see happen when  
19                   he tried that?

20    A             The staff told him to have a seat and  
21                   then they would talk to him when the  
22                   plane landed.

23    Q             And how -- how did they appear when they  
24                   did that?

25                   MR. MAYE: Object to form.

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1     A           They just told him to have a seat and  
2               that they would talk to him about what  
3               was going on when the plane landed.

4     Q           Okay. But in terms of their demeanor,  
5               was it -- was it friendly, was it  
6               aggressive? How did it feel?

7               MR. MAYBE: Same.

8     A           It was strong, not aggressive, but strong  
9               just that I think they were just trying  
10              to keep the situation calm until the  
11              plane landed.

12    Q           Okay. Did Mr. DelVecchia ever say  
13              anything to you or anyone else in the ABC  
14              seats?

15    A           No.

16    Q           Okay. All right. How about the  
17              discussion that you had with the people  
18              in the -- in the B&C seats, do you  
19              remember anything that they said?

20    A           The lady that sat next to me, her and I  
21              were upset because we didn't understand  
22              what was going on. It woke us up out our  
23              sleep. It was kind of like hard to go  
24              back to sleep after that because of all  
25              the commotion going on on the plane.

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1 Q So what sort of commotion do you mean?

2 A Just the -- the dialogue and -- and the

3 child being taken to the back and

4 Mr. DelVecchia, the father of the child

5 that was taken, just -- you could visibly

6 see that he was upset. And I mean, I

7 would be too, if somebody took my child

8 in the middle of a flight, so.

9 Q Okay. Okay.

10 A Yeah.

11 Q Did you hear any of the dialogue

12 specifically -- other than what you've

13 already testified to, did you hear any

14 specific words that were used by the

15 flight attendant?

16 A No.

17 Q Okay. And when you say that the staff

18 was stern in telling him to go back to

19 his seat, was that the African-American

20 gentleman?

21 A Yes.

22 Q Okay.

23 A Yep. Yes.

24 Q Okay. How about do you remember the

25 plane landing in Las Vegas?



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1 A Yes.

2 Q Okay. And what happened when the plane  
3 landed? Was the deplaning normal in your  
4 experience or was there was anything  
5 different about it?

6 A No, it wasn't normal. The staff did tell  
7 Mr. DelVecchio to stay in his seat until  
8 everybody else got off of the plane,  
9 which, he did comply. As I came --  
10 de-boarded the plane and made my way into  
11 the airport to baggage claim, there were  
12 so many police, state troopers. It was  
13 like a lot of law enforcement at the gate  
14 when I got off the plane and I just  
15 thought oh, my god, like, in my mind, I  
16 thought again, this -- they must think  
17 that this has something to do with maybe  
18 some human trafficking because I just  
19 didn't understand what all that law  
20 enforcement was for and I -- I could not  
21 be specific, but that was what I felt.

22 (Inaudible) --

23 Q Okay. Did you hear any oh, I'm sorry, go  
24 ahead.

25 A I'm done.

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1 Q Okay. Did you hear any other passengers  
2 say anything about it?

3 A Other than the lady next to me, no.

4 Q Okay. And even after you got out of the  
5 plane and saw the law enforcement, did  
6 you hear any comments from anybody else  
7 about it?

8 A No.

9 Q Okay. Did you see the DelVecchias do  
10 anything on the plane that you thought  
11 warranted the need for somebody to -- to  
12 approach them and separate them?

13 A No.

14 Q Okay.

15 A It was a quiet flight. Everybody was  
16 relaxed and, you know, kind of taking a  
17 nap --

18 Q Okay.

19 A -- because it's about a four and a half  
20 hour flight. So I think we were all --  
21 well, I know I was tired. I had -- I had  
22 worked that prior to getting on the  
23 plane, so I was exhausted by the time I  
24 actually got on the plane, so I was  
25 trying to catch a nap (inaudible) --

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1 Q Okay. Understood.

2 A -- in Vegas.

3 Q Oh, I missed that last part. What about

4 Vegas?

5 A Well, I got into Vegas, yeah, I was

6 trying to get a nap in until I got in

7 Vegas.

8 Q No problem. Okay. Understood. That's

9 all I have. Ms. Wideman, Mr. Maye might

10 have some questions for you.

11 A Okay.

12 Q Thank you.

13 A Uh-huh.

14 CROSS-EXAMINATION

15 BY MR. MAYE:

16 Q Hi, Ms. Wideman, how are you?

17 A Hi, how are you?

18 Q I'm fine. Thanks for participating here

19 today. I know it's -- it's a

20 inconvenience for you so we appreciate

21 your helping us out here. I have a few

22 questions.

23 A Sure.

24 Q When the -- the staff and the -- the

25 flight attendants escorted the child from

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1 the seat, did they act professionally  
2 toward the child?

3 A Yes.

4 MR. MCKAY: Objection to form.

5 Q And what about the interaction between  
6 Mr. DelVecchia and staff? Was it  
7 professional on the side of the flight  
8 attendants?

9 MR. MCKAY: Objection to the form.

10 A Yes.

11 Q Did the flight attendants act --  
12 withdrawn. When the child was escorted  
13 to the back of the aircraft, the child  
14 didn't appear upset, did he?

15 MR. MCKAY: Objection to the form.

16 A I do not know because I did not see the  
17 child once they escorted him from the  
18 seat. We were all still sitting in our  
19 seats, so no, I didn't see the demeanor  
20 of the child.

21 Q Did -- did you see the demeanor of the  
22 child while he was being escorted from  
23 his seat to the aisle?

24 A Yeah, yes.

25 Q And -- and he didn't appear to be upset

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1 or crying at that time, correct?

2 A He's he appeared --

3 MR. MCKAY: Objection.

4 A -- confused about what was happening.

5 Q Okay. And you -- you never saw any  
6 flight attendant punch Mr. DelVecchia in  
7 the head?

8 MR. MCKAY: Objection to the form.

9 A No.

10 Q And Mr. DelV -- DelVecchia did not appear  
11 to you to have been punched in the head  
12 by anyone, correct?

13 A Not while I was on the plane, no.

14 Q And Mr. DelVecchia didn't complain to you  
15 that he was struck in the head by anyone,  
16 correct?

17 A That's correct.

18 Q And did you see Mr. DelVecchia complain  
19 to any -- anyone else that he was struck  
20 in the head when on the plane?

21 A No.

22 Q Did Mr. DelVecchia ever appear to be  
23 injured physically?

24 A No, I can't recall. It could have been  
25 when I -- once I de-boarded, I did not

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1 see a physical altercation take place  
2 while I was on the plane.

3 Q While you were on the plane, you didn't  
4 observe anything that would indicate that  
5 Mr. DelVecchia had been struck in the  
6 head by anyone, correct?

7 MR. MAYE: Objection to the form.

8 A That's correct.

9 Q Did -- did you ever see Mr. DelVecchia  
10 rub the child's face at any point during  
11 the flight?

12 A No.

13 Q Did you see Mr. DelVecchia ever rub the  
14 child's back during the flight or  
15 shoulders?

16 A Before we got on the plane, yes. And  
17 then when they were relocated from the  
18 emergency aisle into the -- the seats  
19 across from where -- in the same aisle  
20 that I was in, yes, uh-huh, he seemed to  
21 be loving towards his son.

22 Q All right. You said that you saw some  
23 rubbing on the back and shoulders prior  
24 to their boarding. Was that in the  
25 terminal?

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1     A           Uh-huh, yes.

2     Q           And did -- did that strike you as  
3                unusual?

4     A           No, it did not seem inappropriate.

5     Q           And how about the touching on the flight,  
6                did that seem unusual or inappropriate?

7     A           No.

8     Q           Do you ever see the father's, or  
9                Mr. DelVecchia's, hand on the child's  
10               crotch at any point during the flight?

11    A           No.

12    Q           Did you ever hear anything -- any  
13                statements or comments by the flight  
14               attendants that you deemed racist?

15    A           No, I did not.

16    Q           Did you ever observe -- observe -- excuse  
17                me, ever observe any actions by the  
18               flight attendants directed toward  
19               Mr. DelVecchia's child that you deemed  
20               racist?

21               MR. MCKAY: Objection to the form.

22    A           No.

23    Q           Okay. You earlier testified that you  
24                heard a flight attendant tell  
25               Mr. DelVecchia to return to his seat.

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1 Did you hear a flight attendant say  
2 anything else to Mr. DelVecchia while on  
3 the flight?

4 A No.

5 Q I have no further questions, thank you.

6 A Uh-huh.

7 MR. MCKAY: Just -- just one  
8 follow-up, if I may.

9 REDIRECT EXAMINATION

10 BY MR. MCKAY:

11 Q When Mr. Maye asked you if the flight  
12 attendants seemed professional in dealing  
13 with Mr. DelVecchia, you hesitated quite  
14 a long time. What were you thinking?

15 A While they were professional, again, they  
16 were stern about Mr. DelVecchio remaining  
17 in his seat until the plane landed. Once  
18 they took the child to the back of the  
19 plane, Mr. DelVecchio -- once they  
20 chaperoned the child to the back of the  
21 plane, he stood up to what I believe was  
22 to try to get out of the seat to go see  
23 what was going on and they asked him to  
24 remain in his seat.

25 Q Okay. And so he was halfway out of his



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1 seat. Is that how you're describing it?

2 A He was standing -- kind of standing up a

3 little bit like hunched over because you

4 can't really stand up and it -- it was

5 the middle seat, so he was kind of

6 hunched over as if he wanted to get out

7 of the seat and go to the back of the

8 plane to see what was happening with his

9 son.

10 Q And who told him that he could not do

11 that?

12 A The staff told him to remain in his seat.

13 Q And was that the same African-American

14 male?

15 A Yes.

16 Q And did he put his hand on his shoulder

17 or -- or anywhere on his body to push him

18 back down into the seat?

19 A No, I -- no, I didn't see him do that.

20 Q You seemed to hesitate a little bit

21 there. Are you sure?

22 A No -- no, I didn't see him do that. I do

23 remember him saying have a seat and we'll

24 talk to you when the plane landed. I

25 don't remember the man putting his hands

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1 on him at all.

2 Q Okay. All right. That's all I have.

3 MR. MCKAY: Brian?

4 RECROSS EXAMINATION

5 BY MR. MAYE:

6 Q When you saw Mr. DelVecchia and the  
7 African-American flight attendant  
8 interact at that point, did  
9 Mr. DelVecchia accuse the African-  
10 American of striking him in the head?

11 A No.

12 Q Did Mr. DelVecchia at that point appear  
13 to have been struck in the head by  
14 anyone?

15 BY MR. MCKAY: Objection to the  
16 form.

17 A No.

18 Q What -- what was your first recollection  
19 when you woke up regarding what was  
20 transpiring?

21 A What the hell because it -- it was  
22 commotion in the middle of the flight.  
23 We heard the flight attendant. It was  
24 a -- a female flight attendant ask for  
25 the child to come with her to where to

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1 Mr. DelVecchio complied, but we were all  
2 including Mr. DelVecchio, the father of  
3 the child, were all confused about why  
4 they were asking for the child to come to  
5 the back of the plane. So that commotion  
6 is what I -- what woke me up and a lot of  
7 the other people who were on the flight.

8 Q And was the child still in his seat at  
9 that point?

10 A The child was still in the seat. And  
11 when the child got up and went to the  
12 back of the plane, we're still --  
13 Mr. DelVecchio was visibly upset about  
14 what was happening with his son and  
15 questioned the staff as to why they took  
16 his son to which the reply was, when the  
17 plane lands, we'll talk to you more about  
18 what's happening with your son.

19 Myself and the lady next to me  
20 thought again, what the hell? How is it  
21 that you took this man's child and nobody  
22 said anything about what's going on and,  
23 again, it's just a uneasy feeling when  
24 you're that high up in the air in a plane  
25 and someone's visibly upset and no one's

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1                   telling you what's going on, and we're  
2                   just trying to figure out like is  
3                   everything okay. Like, we know that he's  
4                   upset. So at this point, nobody can go  
5                   back to sleep, so we're all kind of just  
6                   frantic wanting this plane to land is  
7                   what I thought --

8       Q           Uh-huh.

9       A           -- you know, is the emotion that I had  
10                  while the rest of the flight was taking  
11                  place.

12      Q           Do you recall where the African-American  
13                  flight attendant was located at the time  
14                  the child was being escorted out of his  
15                  seat?

16      A           He was in the back of the plane.

17      Q           And do you recall if he participated in  
18                  escorting the child from the seat to the  
19                  back of the aircraft?

20      A           Yes, it was two flight -- it was the  
21                  female and it was the African-American  
22                  male that escorted the child together to  
23                  the back of the plane.

24      Q           And did you ever go back and -- to use  
25                  the lavatory in the aircraft after the

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1 child was moved?

2 A No, I did not.

3 Q Okay. Thank you. I have no further  
4 questions.

5 A Uh-huh.

6 FURTHER REDIRECT EXAMINATION

7 BY MR. MCKAY:

8 Q Just a follow-up there, Ms. Wideman. The  
9 female flight attendant, do you remember  
10 about how old she was?

11 A No, I don't.

12 Q Did you see other female flight  
13 attendants on the flight?

14 A There probably was. It's been a long  
15 time, so I don't remember that part of  
16 it.

17 Q Okay.

18 A I remember the commotion around them  
19 taking the child. I don't even remember  
20 how many people -- how many attendants  
21 were even and on the plane at that time.  
22 I just remember what I saw (audio  
23 faltered) child.

24 Q Okay. Fair enough. When the black male  
25 flight attendant was speaking to

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1 Mr. DelVecchia, did you hear him refer to  
2 the child as his son?

3 A Yes.

4 Q Okay. All right. That's all I have.

5 MR. MCKAY: Anything more, Mr. Maye?

6 FURTHER RECROSS EXAMINATION

7 BY MR. MAYE:

8 Q Yes, just one question. So based on your  
9 observations and from what you heard from  
10 Mr. DelVecchia, it was your understanding  
11 that this was father and child?

12 A Yes, that's correct.

13 Q Okay. I have no further questions.

14 MR. MCKAY: Well, Ms. Wideman, thank  
15 you very much for coming this evening.  
16 Now, the -- the way that this process  
17 works is that the -- the gentleman that  
18 you see on the screen with the device in  
19 front of his mouth there is going to be  
20 typing up a transcript after this is all  
21 finished. It'll be a printed transcript  
22 and that will be furnished to the  
23 attorneys. But you have the right to  
24 take a look at it and go over it and make  
25 sure that everything is stated accurately

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1 or you can tell the -- the gentleman here  
2 today that -- that's something that  
3 you're not interested in doing. But he  
4 needs to know because there's two  
5 different procedures. Either he's going  
6 to send it to you for review or he's just  
7 going to send it to the attorneys who --  
8 who purchased the transcript. So could  
9 you -- would you be able to tell us now  
10 what you would like to do?

11 THE WITNESS: Okay. I don't need to  
12 review it.

13 MR. MCKAY: Okay.

14 THE WITNESS: In other words --

15 MR. MCKAY: (Inaudible) --

16 THE WITNESS: -- go ahead. I'm  
17 sorry. I was just going to say my --  
18 what I've given you guys today is what I  
19 actually saw and what actually happened  
20 from my point of view on the plane, so.

21 MR. MCKAY: All right. Thank you.  
22 Well, we -- we do appreciate that and as  
23 far as the subpoena that you received,  
24 you are released from that now. You can  
25 forget about that.

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1 THE WITNESS: Okay.

2 MR. MCKAY: All right. (Inaudible)  
3 you can sign off whenever you want. We  
4 will probably be talking about a few  
5 administrative things, but we have to  
6 wait for the videographer to say his  
7 piece first.

8 THE WITNESS: Okay.

9 THE COURT REPORTER: All right.

10 THE WITNESS: All right, thank you.

11 THE VIDEOGRAPHER: This concludes  
12 today's video deposition. We are going  
13 off the record at 6:48 p.m.

14

15 (THE PROCEEDINGS CONCLUDED AT 6:48 P.M.)

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1 CERTIFICATE

2 State of North Carolina

3 County of Forsyth

4 I, Dale L. Ring, a notary public in and  
5 for the State of North Carolina, do hereby  
6 certify that there came before me on the 7th  
7 day of November, 2022, the person hereinbefore  
8 named, who produced satisfactory evidence of  
9 identification and was by me duly sworn to  
10 testify to the truth and nothing but the truth  
11 of her knowledge concerning the matters in  
12 controversy in this cause; that the witness  
13 was thereupon examined under oath, the  
14 examination reduced to typewriting.

15 I further certify that I am not counsel  
16 for, nor in the employment of any of the  
17 parties to this action; that I am not related  
18 by blood or marriage to any of the parties,  
19 nor am I interested, either directly or  
20 indirectly, in the results of this action.

21 In witness whereof, I have hereto set my  
22 hand, this the 30th day of November, 2022.

23 *Dale Ring*  
24 Dale L. Ring  
25 Notary Public

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